

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION

UNITED STATES OF AMERICA )

SEALED

V. )

NO. EP-11-CR-\_\_\_\_\_

ROBERT E. CUFF )

**EP11CR3016**MOTION FOR LEAVE TO FILE UNDER SEAL

Comes now the United States of America, by and through the United States Attorney for the Western District of Texas and files this its Motion For Leave to File Under Seal the Indictment in the above-styled cause and would respectfully show onto the Honorable Court as follows:

## I.

On **December 14, 2011**, the Grand Jury returned a True Bill of Indictment, charging the Defendant listed above. The disclosure of the existence of the Indictment would seriously jeopardize the ability of law enforcement officers to locate the Defendant and apprehend him without incident. The Government therefore seeks an Order of the Court placing the Indictment and related documents under seal. When the Defendant is arrested, the Indictment and related documents will be unsealed.

WHEREFORE, premises considered, the United States respectfully prays that the Indictment in the above entitled and numbered cause, and this Motion and Order, be SEALED. When the Defendant is arrested, the Indictment and related documents will be unsealed.

Respectfully submitted,

ROBERT PITMAN  
UNITED STATES ATTORNEY

BY: 

DANIEL R. CRUMBY  
Assistant U.S. Attorney  
Texas Bar #24049839  
700 E. San Antonio, Suite 200  
El Paso, Texas 79901  
(915) 534-6884